



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 30 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Jim Tozzi
Member, CRE Board of Advisors
Center for Regulatory Effectiveness
11 Dupont Circle, NW, Suite 700
Washington, DC 20036-1231

Dear Mr. Tozzi:

We have received your request of November 25, 2002 requesting correction under the Environmental Protection Agency's (EPA) Information Quality Guidelines (EPA IQG RFC #2807). You filed this Request for Correction along with the Kansas Corn Growers Association, and the Triazine Network. Your request alleges that the April 22, 2002 preliminary *Environmental Risk Assessment for Atrazine* does not comply with the "Data Quality Act" (Section 515 of the Treasury and General Government Appropriations Act for the Fiscal Year 2001) because the document "states that atrazine causes endocrine effects in various organisms including frogs" on pages 11 and 90-94. You request that the document be corrected to state that there is no reliable evidence that atrazine causes "endocrine effects" in the environment and that there can be no reliable, accurate or useful information regarding atrazine's endocrine effects until and unless there are test methods for those effects that have been properly validated.

Because your Request for Correction is the first one to be submitted to the Office of Pesticide Programs since the issuance of the EPA Information Quality Guidelines in October, 2002, we would like to take this opportunity to explain our process for responding to Requests for Correction on information disseminated to the public as part of an EPA public comment process. We intend to treat your Request for Correction procedurally like a comment to the Draft Interim Reregistration Eligibility Decision (IRED) for Atrazine, addressing it in the response to comments rather than through a separate response mechanism. EPA believes that the thorough consideration provided by the public comment process serves the purposes of the Information Quality Guidelines. This procedure has the advantage of placing our response to Requests for Correction in the context of other comments and the Agency's response to those comments in a venue that is familiar and accessible to the public. Accordingly, we will respond to your Request for Correction in a "Response to Comments" document that will accompany the IRED for Atrazine that we expect to release shortly.

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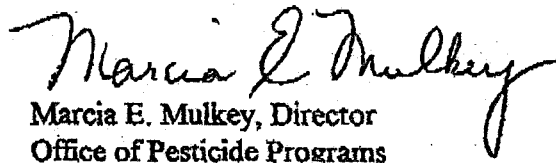
After reviewing the issues raised in your request, it is our view that by clarifying the April, 2002 preliminary *Environmental Risk Assessment for Atrazine* we may help to avoid any future misunderstanding of the Agency's position on the environmental effects of atrazine. We plan to include any such clarifications when we release the revised *Environmental Risk Assessment for Atrazine*.

We believe that it would be inappropriate to amend the *Environmental Risk Assessment for Atrazine* as you suggested because it is premature to conclude that there is "no reliable evidence that atrazine causes 'endocrine effects' in the environment." As you may know, the Agency is still deliberating on the reliability, reproducibility and significance of data on the potential effects of atrazine on frogs. In accordance with an amended Consent Decree in the Natural Resources Defense Council v. Whitman, Case no. C-99-3701 CAL, the Agency will analyze the studies identified in your submission, and any additional studies submitted to the Agency by February 2003, and present a summary of the analysis to the Federal Insecticide, Fungicide and Rodenticide Act Scientific Advisory Panel (SAP). EPA intends to present these issues to the SAP at a public meeting in June, 2003. The SAP will provide external peer review of the studies on the potential effects of atrazine on frogs as well as address specific science issues associated with these studies. Based on this advice, EPA may amend its *Environmental Risk Assessment for Atrazine* and the IRED for atrazine and expects to release the revised IRED in October, 2003. Additionally, because we were unable to locate the passage in the April, 2002, preliminary *Environmental Risk Assessment for Atrazine* in which you said that the Agency states, "Atrazine causes endocrine effects in various organisms including frogs," we do not believe any corrections are warranted in response to that portion of your request.

As EPA will further explain in the IRED's "Response to Comments," we believe that our use of the studies identified in your request is appropriate and consistent with the Agency's Information Quality Guidelines.

Additionally, we believe that the IRED "Response to Comments" document will respond to your Request for Correction and will explain in more detail our conclusion that there is room for improving the clarity of our communication, and the IRED itself will reflect these improvements. We appreciate your continued interest in the Agency's activities.

Sincerely,


Marcia E. Mulkey, Director
Office of Pesticide Programs

cc: EPA IQG Processing Staff — OEI/OIC